

## **REVISED: Inventory of Lands that may or may not be Suitable for Inclusion in the National Wilderness Preservation System**

*This document details how the GMUG interpreted the Forest Service Handbook 1909.12 Chapter 70 inventory criteria, and incorporated refinements based on public input.*

### **Introduction**

When revising the land management plan, the GMUG National Forests (GMUG) are required to identify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System (NWPS) and determine whether to recommend any such lands for wilderness.<sup>1</sup> A description of this process can be found in the 2012 Forest Service Planning Rule and Chapter 70 of the Forest Service Land Management Planning Handbook 1909.12. This process includes the following four steps:

1. Inventory. Identify and inventory all lands that may be suitable for inclusion in the National Wilderness Preservation System using a required set of criteria.
2. Evaluation. Evaluate the wilderness characteristics of each inventoried area using a required set of criteria.
3. Analysis. The forest supervisor will determine which areas, if any, to further analyze in the National Environmental Policy Act (NEPA) process. Areas not included in an alternative are documented as to why they weren't further analyzed.
4. Recommendation. The forest supervisor will decide which areas, if any, to recommend for inclusion in the National Wilderness Preservation System (NWPS). Lands evaluated and analyzed through this process and the resulting NEPA analysis are preliminary administrative recommendations. Congress has reserved the authority to make final decisions on wilderness designation.

### **Step 1: Inventory**

The primary function of the Inventory step is to identify all lands on the GMUG that may be suitable for inclusion in the National Wilderness Preservation System. Lands included in the Inventory are documented and identified on a map and carried forward for further evaluation.

The intent of the Inventory step is to broadly identify Forest lands that may have wilderness characteristics, and to allow for public input and feedback on the inventoried areas. It is important to note that Forest lands included in the Inventory stage provide a starting point for further evaluation of wilderness characteristics, and their inclusion is *NOT* a designation that conveys or requires a particular kind of management.

The Inventory is intended to be broad and inclusive, based on the Inventory criteria identified in the Forest Service Handbook.<sup>2</sup> The following details how the GMUG interpreted the Forest Service Handbook 1909.12 Chapter 70 inventory criteria in order to make the inventory stage fully transparent. Where not already established by the Forest Service Handbook, the interpretation of the criteria will be edited and refined based on public input.

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<sup>1</sup> FSH 1909.12 Chapter 70, section 71.21 and section 71.22a.

<sup>2</sup> FSH 1909.12 Chapter 70, section 70.61.

## Inventory Criteria

Chapter 70 of the Forest Service Land Management Planning Handbook 1909.12 outlines criteria for what should and should not be included in the Inventory. There are three categories of criteria: (1) size, (2) road improvements, and (3) other substantially noticeable improvements. These criteria and definitions, further detailed by the GMUG planning team, are outlined in the following sections.

After applying the size and improvements criteria, the handbook directs the Responsible Official to review information provided through public participation during the assessment phase of the plan revision process, including areas that have been proposed for consideration as recommended wilderness through a previous planning process (i.e., the 2007 GMUG Proposed Plan), collaborative effort, or in pending legislation. With respect to areas proposed for consideration as recommended wilderness through collaborative efforts, two citizen proposals for wilderness and other special designations were submitted to the GMUG during the assessment phase. These proposals will be considered in combination with other public comments received throughout the GMUG wilderness process. With respect to pending legislation, all lands proposed for wilderness designation in the San Juan Mountains Wilderness Bill are included in the Inventory and will be considered throughout the GMUG wilderness process.

### Size

Areas to be included in the Inventory must be federal lands and must meet one of the following size criteria:

1. The area contains 5,000 contiguous acres or more.
2. The area contains less than 5,000 contiguous acres, but is of sufficient size as to make practicable its preservation and use in an unimpaired condition, including but not be limited to areas contiguous to an existing wilderness, primitive areas, administratively recommended wilderness, or wilderness inventory of other Federal ownership.

### Improvements

Lands to be considered for Inventory may or may not have improvements. Improvements show evidence of human activities such as roads, structures, or past management activities. The presence of such improvements does not necessarily eliminate areas for consideration in the Inventory; however, if the improvements are substantially noticeable, they may be removed from lands at the Inventory stage. The different criteria for improvements are outlined below.

### ***Road Improvements Criteria***

Chapter 70 of the Forest Service Land Management Planning Handbook 1909.12 outlines criteria for what road improvements should and should not be included in the inventoried areas.<sup>3</sup> The GMUG has further detailed these criteria to make the process fully transparent, as shown in the table below.

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<sup>3</sup> A forest road is defined as a road wholly or partly within or adjacent to and serving the National Forest System that the Forest Service determines is necessary for the protection, administration, and utilization of the System and the use and development of its resources (36 CFR 212.1).

**Table 1. Road Improvements Criteria**

<b>Inventory Criteria Identified in Planning Directives<sup>4</sup></b>	<b>GMUG Inventory Criteria</b>
<b>Road Improvements</b>	<p><u>Areas with roads <b>excluded</b> from Inventory:</u></p> <ol style="list-style-type: none"> <li>1. Permanently authorized roads validated by a Federal court or the Department of Interior for which a valid easement or interest has been properly recorded;</li> <li>2. Areas that contain Forest roads maintained to levels 2<sup>5</sup>, 3, 4, or 5.</li> </ol> <p><i>Note: Excluded roads also have a buffer of approximately 300 feet on either side of the road centerline, to include room for the road width, right-of-way, and potential geospatial data inaccuracies.</i></p> <p><u>Areas with roads <b>included</b> in Inventory and considered in Evaluation<sup>6</sup>:</u></p> <ol style="list-style-type: none"> <li>1. Areas that contain forest roads maintained to level 1 (closed to all motor vehicles)<sup>7</sup>;</li> <li>2. Areas with any routes that are decommissioned, unauthorized or temporary, or forest roads that are identified for decommissioning in a previous decision document, or identified as likely unneeded in a travel management plan (26 CFR 212.51) or a travel analysis (CFR 212.5(b));</li> <li>3. Areas with forest roads that have been proposed by the Forest Service for consideration as recommended wilderness as a result of a previous forest planning process; or areas with forest roads that the Responsible Official merits for inclusion in the Inventory that were proposed for consideration through public involvement during the assessment or other public or intergovernmental participation opportunity; and</li> <li>4. Areas with historical wagon routes, historical mining routes, or other settlement-era transportation features considered part of the historical and cultural landscape of the area.</li> </ol>

***Other Substantially Noticeable Improvements Criteria***

Chapter 70 of the Forest Service Land Management Planning Handbook 1909.12 outlines criteria for other improvements that should and should not be included in the inventoried areas. One such criterion allows the exclusion of improvements that are “substantially noticeable” to the area as a whole, which the GMUG planning team further detailed in the Decision Matrix for Other Improvements Criteria below (Table 2). The term “substantially noticeable” is not directly defined in Chapter 70 of the Forest Service

<sup>4</sup> FSH 1909.12 Directives, Chapter 70.

<sup>5</sup> ML2 roads on the GMUG were excluded as they all meet the criteria noted at FSH 1909.12, Chapter 70, section 71.22.a.2.c.

<sup>6</sup> Guidance on forest road improvements considered can be found in FSH 1909.12, Chapter 70, section 71.22a.

<sup>7</sup> Note that the GMUG does not contain forest roads currently scheduled to be reclassified to ML1 through a previous decision document, so the inclusion criteria at FSH 1909.12 Directives, Chapter 70, section 71.22a.1.c did not apply.

Land Management Planning Handbook. The GMUG planning team adopted an accepted definition of “substantially noticeable” for the other improvements criteria that has been used in other Forests’ wilderness processes. To be considered substantially noticeable in the area as a whole, “other improvements” must be substantially noticeable according to the following definition:

*An improvement is **substantially noticeable** when it creates a noticeable difference in form, line, color, texture and pattern in the surrounding natural landscape at a size, scale, or concentration that contrasts with the surrounding natural landscape. To be substantially noticeable, the improvement or concentration of improvements must be more dominant than the surrounding natural landscape scene.*

Not all improvements that are substantially noticeable are eliminated from the Inventory due to data limitations and the assumptions made below. For instance, some features on a landscape may be substantially noticeable but are located outside of an established road buffer. In finalizing the wilderness Inventory, polygons were modified in response to public comment. It is also important to remember that all remaining substantially noticeable features that ended up in the inventory, as well as non-substantially noticeable features, will be considered during the next stage of the wilderness process: *Evaluation*. If the Evaluation stage reveals that substantially noticeable improvements were mistakenly included within Inventory areas, the polygon boundary can be modified to exclude the improvements. If the boundary adjustment reduces the polygon acreage below 5,000 acres, the size criteria (described above) will be reapplied. Conversely, if polygon boundaries are found to exclude improvements that are found *not* to be substantially noticeable during evaluation discussions, the polygon boundary can be expanded accordingly.

**Table 2. Inventory Decision Matrix for “Other Improvements” Criteria**

<b>Inventory Criteria Identified in Planning Directives<sup>8</sup></b>	<b>Present on the GMUG? (YES/NO)</b>	<b>Substantially Noticeable? (YES/NO)</b>	<b>Include or Exclude? (IN, EX, or BOTH)</b>	<b>Rationale for including in / excluding from Inventory</b>
1. Airstrips and Heliports	NO	N/A	N/A	N/A

<sup>8</sup> FSH 1909.12 Directives, Chapter 70.

Inventory Criteria Identified in Planning Directives <sup>8</sup>	Present on the GMUG?  (YES/NO)	Substantially Noticeable?  (YES/NO)	Include or Exclude?  (IN, EX, or BOTH)	Rationale for including in / excluding from Inventory
2. Vegetation treatments	YES	YES & NO  (see Rationale)	BOTH  (see Rationale)	<p>If the vegetation treatment involved tree removal beyond single tree removal and occurred after 1940 (unless otherwise indicated in the footnote), it is considered substantially noticeable and has been <b>excluded</b> from the Inventory.<sup>9</sup></p> <p>Other types of vegetation treatment (i.e., weed treatment) are <b>included</b> in the Inventory.</p>

<sup>9</sup> The following list is vegetation treatment activities considered substantially noticeable, and from what date range. **All occurrences from any year:** Fill-in or replant trees (plantation), permanent land clearing, and watershed resource non-structural improvements erosion control; **1940 to present:** coppice cut, disease control (mistletoe control in form of clearcuts), fill-in seed or reseed trees (used in clearcuts when natural regeneration has failed), group selection cut, insect control (salvage and thinning activities), over story removal cut (from advanced regeneration), patch clear-cut, piling of fuels (hand or machine – these reflect areas of timber harvest, most are machine), plant trees (used in clearcuts), pre-commercial thin (still noticeable from CCC era), salvage cut (intermediate treatment, not regeneration), sanitation cut, seed-tree cuts (visual impact comparable to clearcuts), Shelterwood establishment cuts (visual impact comparable to clearcuts), single-tree selection cut, site preparation for natural regeneration (mechanical – still noticeable scars from heavy equipment), site preparation for planting (mechanical – code used for terracing activity), stand clear-cuts, tree encroachment control (chainings), tree release and weed (thinning still noticeable from CCC era), and wildlife habitat [activities, create corridors, mechanical treatment (roller chopping and chainings), non-structural improvements (clearcuts), and regeneration cut]; **1950 to present:** Commercial thin; **1950 to 1991:** Range control vegetation, range seeding and planting, and range site treatment for water conservation; **1980 to present:** Thinning for hazardous fuels reduction and wildlife habitat intermediate cuts. // For activities that do not have the visual impacts of clearcuts, plantations, terracing, and chaining, the team examined recent and dated activities with aerial imagery at a scale of generally 1 inch = 1/3 mile to categorize an activity as substantially noticeable or not. Activities excluded from the draft inventory but reincorporated into the **revised** inventory via aerial imagery examination included: Fireline construction, fuel breaks, improvement cuts, and precommercial thinning for visual.

Inventory Criteria Identified in Planning Directives <sup>8</sup>	Present on the GMUG? (YES/NO)	Substantially Noticeable? (YES/NO)	Include or Exclude? (IN, EX, or BOTH)	Rationale for including in / excluding from Inventory
3. Timber harvest areas <sup>10</sup>	YES	YES	EX	All timber harvest areas that occurred after 1940, unless otherwise indicated in the vegetation activities, are considered substantially noticeable for the Inventory. Timber harvest areas are roaded, interwoven with skid trails, have persistent stumps, etc. These are <b>excluded</b> from the Inventory.
4. Permanently installed vertical structures	YES	YES	EX	Vertical structures are generally associated with roads and are <b>excluded</b> from the Inventory via road buffer.
5. Areas of mining activity	YES	YES & NO (see Rationale)	BOTH (see Rationale)	Existing infrastructure associated with areas of active mining activity are considered substantially noticeable and are <b>excluded</b> from the Inventory. Mineral material sites (e.g., gravel pits) representing active mines are <b>excluded</b> with a 300-foot buffer.  Infrastructure associated with abandoned mines are not considered substantially noticeable at this stage and are <b>included</b> in the Inventory.

<sup>10</sup> FSH 1909.12 Directives, Chapter 70, section 71.22b directs the inventory to include lands where evidence of past human activities are not substantially noticeable. Therefore, only areas of previous timber harvest were considered during this step. Contemplation of anticipated management activities and the projected suitable timber base (under development for forest plan revision) will occur during Analysis and, potentially, Recommendation.

Inventory Criteria Identified in Planning Directives <sup>8</sup>	Present on the GMUG?  (YES/NO)	Substantially Noticeable?  (YES/NO)	Include or Exclude?  (IN, EX, or BOTH)	Rationale for including in / excluding from Inventory
6. Range improvement areas	YES	YES & NO <i>(see Rationale)</i>	BOTH <i>(see Rationale)</i>	Range infrastructure is generally associated with roads and is therefore <b>excluded</b> from the Inventory via road buffer.  If not associated with the road, it is <i>not</i> considered substantially noticeable and <b>included</b> in the Inventory.
7. Recreation improvements – i.e., campgrounds, trailheads, recreation resorts, etc.	YES	YES	EX	Recreation improvements are generally associated with roads and are <b>excluded</b> from the Inventory via the 300-foot road buffer. Recreation resorts (Powderhorn, Telluride, Crested Butte, and Monarch) are excluded from the Inventory using the associated ski area permit boundary. <sup>11</sup>
8. Ground-return telephone lines, electric lines, and powerlines	YES	YES	EX	Utility infrastructure is generally associated with roads and are <b>excluded</b> from the Inventory via road buffer. <sup>12</sup>

<sup>11</sup> The full extent of ski area permit boundaries have been authorized for development. Therefore, for all intents and purposes, all lands within the ski area permit boundaries are either developed or are dedicated to some level of development.

<sup>12</sup> Infrastructure, and associated buffer, within the West-Wide Energy Corridor is **excluded** from the Inventory.

Inventory Criteria Identified in Planning Directives <sup>8</sup>	Present on the GMUG? (YES/NO)	Substantially Noticeable? (YES/NO)	Include or Exclude? (IN, EX, or BOTH)	Rationale for including in / excluding from Inventory
9. Watershed treatment areas - ditches, dams, reservoirs	YES	YES	<b>BOTH</b> <i>(see Rationale)</i>	<p>There is extensive water development on the GMUG, some of which are excluded from the Inventory via road buffer. Reservoirs (i.e., water bodies impounded by a dam) that are 75 acres or larger in size are <b>excluded</b> from the Inventory, as this natural breakpoint in the data represents the most noticeable reservoirs and associated reservoir infrastructure on the Forests.</p> <p>All ditches are <b>included</b> in the Inventory, as well as reservoirs less than 75 acres.</p>
10. Lands adjacent to development or activities that impact solitude	YES	<i>TBD in Evaluation</i>	IN	Any such areas are <b>included</b> in the Inventory, and will be addressed in the Evaluation stage where they exist.
11. Structures, dwellings, and other relics of past occupation when they are considered part of the historical and cultural landscape	YES	NO	<b>BOTH</b> <i>(see Rationale)</i>	<p>Most structures are inherently <b>excluded</b> from the Inventory because they are located within 300 feet of a maintenance level 2, 3, 4, or 5 road.</p> <p>If not associated with the road, it is <i>not</i> considered substantially noticeable and <b>included</b> in the Inventory.</p>



<p>12. Previously recommended wilderness, or areas proposed for consideration through public or intergovernmental participation that the Responsible Official merits for inclusion in the Inventory</p>	<p>YES</p>	<p>N/A</p>	<p>BOTH <i>(see Rationale)</i></p>	<p>Recommended Wilderness areas from the 2007 GMUG Proposed Plan are <b><i>included</i></b> in the Inventory.</p> <p><i>Note:</i> Congress has already considered and designated the Tabeguache Area, Roubibean Area, and Fossil Ridge Recreation Management Area for specific management (not designated Wilderness) under the Colorado Wilderness Act of 1993. Because Congress has already considered these areas and made these specific designations, these areas are <b><i>excluded</i></b> from the Inventory and will not be contemplated during the Evaluation stage.</p> <p>With respect to areas proposed for consideration as recommended wilderness by citizen groups, two citizen proposals for wilderness and other special designations were submitted to the GMUG during the assessment phase. These proposals will be considered, and any other citizen proposals and comments, in the next stages of the GMUG wilderness process.</p> <p>With respect to actively pending legislation, lands included in the San Juan Mountains Wilderness Bill are <b><i>included</i></b> in the Inventory and will be considered throughout the GMUG wilderness process.</p>
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## Appendix I. Summary of Public Input & Response:

*In response to public comments, a total of about 95,000 acres were reincorporated to the revised Inventory. Of note, the polygon numbers on the revised Inventory map are not sequential. Numbers within the 1 to 173 range generally reflect the initial Inventory polygons, with minor changes. Polygons 180 to 182 reflect lands that were previously included in the initial Inventory, but were renumbered due to more substantial changes. All polygons in the 200s represent entirely new polygons. The following is a summary of public comments on the initial Inventory, and how we have addressed the comments in the revised Inventory.*

- A. **Polygon details:** Comments include specific details and/or concerns about inventoried polygons such as geographic and ecological aspects, uses, management activities and strategies, economic implications, special qualities, and place-based values. Comments also express support for specific inventoried polygons and include suggested boundaries, should those areas be recommended for Wilderness.

*This information will be included and/or considered during Evaluation and Analysis (for those polygons carried forward for analysis because they are included in one or more forest plan alternatives). Inventoried polygons are those that met the inclusive parameters outlined in the Inventory Criteria document. During Evaluation, all inventoried polygons are evaluated for wilderness characteristics. For the purposes of having larger and fewer polygons to evaluate, inventoried polygons have been adjoined, where appropriate, to create evaluation polygons. The Analysis step begins with the Forest Supervisor determining which evaluated areas, if any, to further analyze in the Environmental Analysis process as part of the Forest Plan proposed action alternatives. The Analysis step will look more closely at considerations such as current uses of the area and potential trade-offs should an area (or portion of an area) be recommended to be designated as wilderness. Additionally, finer boundary adjustments are expected to occur for any polygons analyzed, and potentially recommended, for inclusion in the NWPS.*

- B. **Substantially noticeable features:** Comments express concerns about the initial interpretation and application of the substantially noticeable features criteria, such as the extent to which vegetation treatments, timber harvest, mining activities, and water features were either included or excluded from the initial Inventory.

*The Inventory criteria and map have been revised to reflect more judicious parameters for excluding and including each feature in the Inventory – see Table 2 for details. Not every area that is excluded from the Inventory was validated via review of aerial imagery or field surveys; however, a representative group of vegetation management/timber harvest, mining areas, and reservoirs were reviewed through aerial imagery to confirm that a reasonable threshold was established for determining substantially noticeable features across the GMUG.*

Comments request that language be included in the Inventory criteria regarding suitable timber acres, and that lands considered as suitable for timber harvest in the future be excluded from the Inventory.

*The identification of areas suitable timber production is under development for the GMUG's Forest Plan revision process and will be presented in Draft Plan alternatives. As directed at Forest Service Handbook 1909.12 Directives, Chapter 70, section 71.22b, the Inventory step of the wilderness process considers where evidence of past and ongoing human activities are or are not currently substantially noticeable on the landscape. Trade-offs between anticipated future*

*vegetation and other management activities in a given area versus a potential wilderness recommendation for a given area will be considered during Analysis and made available for public comment in the Draft Plan and Draft EIS. Language was added to Table 2 in the Inventory criteria to clarify this detail.*

- C. Adjacent lands and Colorado Roadless Areas (CRAs):** Comments indicated that the initial Inventory did not comprehensively consider the influence of adjacent lands as specified at Forest Service Handbook 1909.12 Directives, Chapter 70, section 71.21(2), such as Bureau of Land Management (BLM) Wilderness, BLM Wilderness Study Areas (WSAs), BLM Inventoried Lands of Wilderness Characteristics (LWCs), and wilderness inventory areas on adjacent national forests.

*The revised Inventory reflects consideration of BLM Wilderness areas, BLM WSAs, BLM LWCs, and Rio Grande National Forest 2016 wilderness inventory polygons immediately adjacent to the GMUG forest boundary. Two polygons were added due to adjacent BLM Wilderness (polygons 201 and 202), three polygons were added due to adjacent BLM WSAs (polygons 226, 228, and 229), and five polygons were added due to adjacent BLM LWCs (polygons 200, 215, 216, 217, and 244). A total of seven polygons were added to the Inventory due to adjacent Rio Grande National Forest 2016 wilderness inventory polygons (polygons 233, 239, 240, 258, 269, 286, and 287). These 17 polygons add a total of about 23,000 acres to the revised Inventory from consideration of adjacent lands outside of the GMUG forest boundary. Additionally, the revised Inventory reincorporates about 9,000 acres immediately adjacent to Tabeguache and Roubideau designated areas within the GMUG forest boundary that were not previously included in the initial Inventory. The GMUG Inventory deliberately considers adjacent wilderness areas on neighboring national forests since GMUG wilderness areas straddle Forest Service administrative boundaries. The GMUG Inventory does not consider adjacent wilderness inventory polygons for the White River or Pike-San Isabel National Forests because those inventories are significantly outdated, and therefore unreliable to represent current conditions.*

Comments requested that the Inventory include all CRAs within GMUG lands and consider the influence of CRAs located immediately adjacent to the GMUG forest boundary.

*After the Inventory was revised to reflect improved parameters for substantially noticeable features (see Table 2) and considerations of adjacent BLM and Rio Grande National Forest lands as described above, a total of about 13,000 acres of GMUG CRAs remain excluded from the revised Inventory. These pockets of CRA lands are eliminated from the Inventory based on containing substantially noticeable features, such as timber harvest treatments or existing coal infrastructure, and/or being less than 5,000 acres in size and not contiguous to an existing designated area. With respect to CRAs on adjacent Forests, there are a total of about 760 acres of GMUG lands which abut neighboring CRAs and are excluded from the Inventory based on containing substantially noticeable features and/or being less than 5,000 acres in size and not contiguous to an existing designated area. None of these polygons are of sufficient size to consider as part of the Inventory. This is consistent with FSH 1909.12 Chapter 70.*

Comments also indicate concern that CRAs were specifically established with the intent to ultimately expand wilderness designations and/or that the wilderness process wrongly acts as a mechanism to convert CRAs to designated wilderness.

*First, the wilderness process is a specific, separate requirement in the 2012 Forest Service Planning Rule and Chapter 70 of the Forest Service Land Management Planning Handbook 1909.12. Second, the intent of the Colorado Roadless Rule was not to establish de facto*

wilderness designations. The Department of Agriculture, the Forest Service, and the State of Colorado agreed that there was a need to provide management direction to conserve roadless area values and characteristics within roadless areas in Colorado. The 2012 Colorado Roadless Rule Final Environmental Impact Statement (FEIS) acknowledges that inventoried roadless areas were originally identified as part of the wilderness inventory process; however, the 2012 Colorado Roadless Rule FEIS does not speculate about future wilderness designations as a result of the rule. While management direction for upper tier acres limits the potential for road construction/reconstruction and tree cutting, upper tier designation does not imply wilderness management direction. For example, motorized trails can be included within designated CRAs, including upper tier areas. Wilderness management direction is much more restrictive regarding the types of activities that can occur within designated areas, including prohibitions on motorized equipment and mechanical transport, commercial activities, structures, improvements, and types of primitive recreation activities. Congress has the sole authority to designate areas as wilderness.

The Colorado Roadless Rule does not preclude the further consideration of Colorado Roadless Areas for wilderness, when such consideration is done in conjunction with Forest Plan Revision. Furthermore, when revising land management plans, forests are required by the 2012 planning rule (36 CFR 219) to identify and evaluate lands that may be suitable for inclusion in the NWPS, and to determine whether to recommend any such lands for wilderness designation. As directed at Forest Service Handbook 1909.12 Directives, Chapter 70, section 71.1, the inventory process starts by considering existing, relevant information identified during the assessment phase, including information about designated areas such as inventoried roadless areas. Despite the fact that the directives specifically list inventoried roadless areas as a point of consideration, inventoried roadless areas are only one of many current condition/information sets considered during the required wilderness process. Such areas still need to be considered with respect to all other inventory criteria. The GMUG Wilderness Process's Inventory Criteria document provides the GMUG's interpretation of the inventory steps and criteria explained in section 71.2 of the directives, along with revisions based on public input.

- D. San Juan Mountains Wilderness Bill:** Comments request that the Inventory incorporate all lands encompassed in the proposed San Juan Mountains Wilderness Bill.

Forest Service Handbook 1909.12 Directives, Chapter 70, section 71.2 directs the Responsible Official to review information provided through public participation during the assessment phase of the plan revision process, including areas that have been proposed for consideration as recommended wilderness through pending legislation. All lands proposed for wilderness designation in the San Juan Mountains Wilderness Bill are included in the revised Inventory and will be considered throughout the GMUG wilderness process. The Forest Plan revision team is aware of minor boundary discrepancies between the GMUG wilderness polygons and the official San Juan Mountains Wilderness Bill polygons. Finer boundary adjustments are expected to occur for any polygons ultimately analyzed, and potentially recommended, for inclusion in the NWPS; therefore, for all intents and purposes, the entirety of the lands included in the San Juan Mountains Wilderness Bill are included in the revised Inventory.

- E. Collaborative efforts (GPLI and Citizens' Proposal):** Comments request that the GMUG Wilderness process include consideration of areas put forth in the Gunnison Plan lands Initiative (GPLI) and Citizens' Proposal.

Forest Service Handbook 1909.12 Directives, Chapter 70, section 71.2 directs the Responsible Official to review information provided through public participation during the assessment phase

*of the plan revision process, including areas that have been proposed for consideration as recommended wilderness through a collaborative effort. Two proposals for wilderness and other special designations developed through a collaborative effort were submitted to the GMUG during the assessment phase of the Forest Plan revision process. These proposals for recommended wilderness will be considered in combination with other public comments received throughout the GMUG wilderness process. These proposals for other special designations, such as recommended Special Interest Areas or Special Management Areas, will be considered in combination with other public comments received throughout the Forest Plan revision process.*

- F. Snow Mesa & northeast of Treasure Mountain areas:** Comments request that the Inventory include the Snow Mesa area, as well as the area northeast of Treasure Mountain.

*These areas are located on the Rio Grande National Forest and White River National Forest, respectively. Only lands within the GMUG's administrative boundary qualify for inclusion in the GMUG's wilderness Inventory.*

- G. Geospatial data:** Comments suggest that errors in the geospatial data used to develop the Inventory map may have mistakenly excluded or included lands from/in the Inventory.

*To ensure consistency among all Forest Plan revision processes and products, a "snapshot" of GMUG data was taken at the beginning of Forest Plan revision. Given that Forest Plan revision analysis is a landscape-level, programmatic scale, the same data will be used throughout the entire Forest Plan revision process. Updates to specific data sets and/or on-site surveys will be conducted prior to implementation of any projects or, for the wilderness process, any polygon recommendations for wilderness designation.*

*The geospatial data used in this process is considered the best available corporate data at the time the "snapshot" was taken, and the likelihood of projection issues eliminating an entire polygon (at least 5,000 acre area) is low. To account for evident data discrepancies, polygons less than 50 acres and adjacent to existing designated areas (or where otherwise appropriate) were eliminated from the inventory. For example, such "boundary slivers" occurred between the Fossil Ridge Recreation Management Area and Fossil Ridge Wilderness – designated areas that share a common boundary. These false polygons were an artifact of inaccurate boundary mapping and not relevant for consideration in this process.*

*It is also important to note that geospatial data serves as a starting point for taking stock of forest lands that may qualify for inclusion in the NWPS. Any lands that may be incorrectly excluded from the Inventory can be discussed, and reintroduced as appropriate, during the Evaluation step. Conversely, the Forest Plan Revision team is aware that some small areas of land may be mistakenly included in the Inventory as a result of outdated data producing minor inaccuracies. Any lands that may be incorrectly included in the Inventory can also be discussed, and identified/dismissed as substantially noticeable, during the Evaluation step. Lastly, finer boundary adjustments are expected to occur for any polygons ultimately analyzed, and potentially recommended, for inclusion in the NWPS. Language has been added to the "Other Substantially Noticeable Improvements Criteria" section of the Inventory criteria to clarify these details.*

- H. Roads and trails:** Comments highlight the presence of specific roads and trails within or immediately adjacent to inventoried polygons.

*Regarding roads, the Inventory excludes or includes roads based on the road-related criteria specified in Forest Service Handbook 1909.12 Directives, Chapter 70, section 71.22.a – see Table*

*I for details on road improvements criteria. Regarding trails, all existing trails (motorized and non-motorized) are included in the Inventory. During Evaluation, all inventoried polygons are evaluated for wilderness characteristics. The evaluation step identifies and considers the presence of existing trails within each polygon in regards to impacts to opportunities for solitude (Criteria 2) and/or the extent of existing access portals in relation to manageability (Criteria 5).*

Comments request that maintenance level 1 roads be excluded from the Inventory, stating that there could be negative ramifications to forest management and fire suppression activities should any maintenance level 1 roads become incorporated into a wilderness designation.

*This request is not compatible with the road-related criteria at Forest Service Handbook 1909.12 Directives, Chapter 70, section 71.22.a, which explicitly states that areas that contain forest roads maintained to level 1 must be included in the Inventory. However, finer boundary adjustments regarding these types of considerations are expected to occur for any polygons ultimately analyzed and, potentially, recommended for inclusion in the NWPS.*

- I. **Evaluate areas to “undesignate”:** Comments suggest that the GMUG utilize Forest Plan revision and the wilderness process to evaluate, and recommend, areas that should be “undesigned” from their current designated status as Wilderness or CRA.

*This request is outside of the scope of forest planning as set forth in the 2012 Planning Rule and the Chapter 70 Wilderness process.*

- J. **Opposition to additional designated wilderness areas:** Comments express resistance to designating more GMUG lands as wilderness, suggesting that all applicable lands have already been designated and removed from multiple use.

*When revising land management plans, forests are required to identify and evaluate lands that may be suitable for inclusion in the NWPS, and to determine whether to recommend any such lands for wilderness designation. A description of the process requirements can be found in the 2012 Forest Service Planning Rule and Chapter 70 of the Forest Service Land Management Planning Handbook 1909.12. The requisite wilderness process is a means to appraise forest lands for their wilderness characteristics and scrutinize potential recommendations; however, recommendations are not a required result. Regardless of the direct result of this required process, information gathered from the public, specialists, and other entities throughout the wilderness process can benefit other aspects of plan revision. The wilderness process inherently reveals information about the landscape that can inform the development of management areas or other plan direction.*